



COMPLETED
January 22, 1992

ESD

INSPECTION REPORT

by W. Douglas Smith

BURLINGTON ENVIRONMENTAL INC.

AKA Chemical Processors Inc.

734 S. Lucile

Seattle, WA 98108

1-22-92

FACILITY

ADDRESS:

Burlington Environmental Inc.
5501 Airport Way S.
Seattle, WA. 98108

SITE

ADDRESS:

Burlington Environmental Inc.
734 S. Lucile
Seattle, WA 98108

INSPECTION

COMMENCED:

1-22-92 @ 1330 hours

SITE

CONTACTS:

Kat Taeschner, Office Manager
Gary Coil, Plant Superintendent
David L. Aubry, Plant Manager
John Stiller, Sr. Environmental Scientist
Keith Lund, Environmental Scientist

INSPECTION

TEAM:

W. Douglas Smith, Sr. Compliance Investigator,
(206) 553-7176

SITE

BACKGROUND:

As related to me by Mr. Aubry: In 1986 Chemical Processors was owned by the West family with Ron West, President. (b) (6)
(b) (6) A partner, Dave Sabey brought in Burlington Northern Rail Road as part owner in 1987. The subsidiary Burlington Resources split from Burlington RR and became a totally independent company in 1987. Mathis was a subsidiary of Burlington Resources. On January 1, 1992 both the Mathis

division and Chemical Processors officially became Burlington Environmental Inc. All signs, business forms, cards, stationary, etc. were changed on that date. In the near future Burlington Environmental Inc. will spin off from Burlington Resources."

The offices of Burlington Resources are also in Seattle, WA.

The scope of Burlington Environmental Inc. (BEI) business at Lucile St. site was the reclaiming, treatment, and storage of hazardous chemical wastes. They handled wastes generated from industrial, commercial, and residential sources. They handled chemical liquids, gases, PCBs, and solid materials. Most material was kept in 55 gallon drums or in overpack containers.

OPENING CONFERENCE:

I showed my credentials to Mr. David L. Aubry, Plant Manager. He received and signed the Notices of Inspection and Confidentiality. He said that the facility had last been inspected in September, 1991 by Peter Maulm. I said that I would like to review the records generated after that date and look at the facility where PCBs were stored and handled.

RECORDS INSPECTION:

The following records were reviewed in conjunction with the written EPA TSCA PCB Inspection "Request for Information:" A copy was made and kept by the facility (See Attached).

1. Inventory records used to generate the PCB Annual Reports.
2. SFD inventory records
3. Manifests
4. Disposal Certificates
5. Inspection Logs
6. Notices to local fire response team
7. Notification of PCB Activities to EPA/DOE

Manifest records were collected in their entirety and then a random sampling of approximately 20% were reviewed in detail. The records reviewed were detailed and complete. Cross checks with containers observed in the field were verified with the records maintained in the office. There were no conflicts between field observations and any of the data contained in the records.

FIELD INSPECTION:

I was accompanied on the field portion of the inspection by Messrs.. Aubry, Lund, Stiller and Coil. We viewed all areas of

the plant that had been designated in the Facility Operating Plan for the storage or handling of PCBs. In addition I had the "Custody Vault" opened. This unit is used for court directed evidence storage. There were no PCB materials in the vault. The following bays contained PCB materials and were inspected in detail:

1. LW2A. None of the drums were leaking. All drums were enclosed in a welded steel pan with 8 inch side walls. There was a large PCB marker designating the area for PCB storage and large PCB markers on each drum in the area. Accumulation start dates were appropriate. Repacks had dates indicating with the first material was placed into the drum by BEI. Other drums had accumulation start dates based upon when the original generator first placed material into the drum.
2. LW3. None of the drums were leaking. All drums were enclosed in a welded steel pan with 8 inch side walls. There was a large PCB marker designating the area for PCB storage and large PCB markers on each drum in the area. Accumulation start dates were appropriate. Repacks had dates indicating with the first material was placed into the drum by BEI. Other drums had accumulation start dates based upon when the original generator first placed material into the drum.
3. LW4. None of the drums were leaking. All drums were enclosed in a welded steel pan with 8 inch side walls. There was a large PCB marker designating the area for PCB storage and large PCB markers on each drum in the area. Accumulation start dates were appropriate. Repacks had dates indicating with the first material was placed into the drum by BEI. Other drums had accumulation start dates based upon when the original generator first placed material into the drum.
4. CW6 bays A, B, & C. None of the drums were leaking. All drums were enclosed in a welded steel pan with 8 inch side walls. There was a large PCB marker designating the area for PCB storage and large PCB markers on each drum in the area. Accumulation start dates were appropriate. Repacks had dates indicating with the first material was placed into the drum by BEI. Other drums had accumulation start dates based upon when the original generator first placed material into the drum.
5. NW6. None of the drums were leaking. All drums were enclosed in a welded steel pan with 8 inch side walls. There was a large PCB marker designating the

area for PCB storage and large PCB markers on each drum in the area. Accumulation start dates were appropriate. Repacks had dates indicating with the first material was placed into the drum by BEI. Other drums had accumulation start dates based upon when the original generator first placed material into the drum.

There were no stains or odors of Trichlorobenzene in the steel pans containing the drummed PCB material. There were two staging areas on the west side of the warehouse. These areas were identified in the Facility Operating Plan. There were no PCB materials in these areas at the time of this inspection. There were no other materials in storage in the areas designated for PCBs.

The last spill occurred on 8-2-90. The incident was reported the Washington Department of Ecology and the US. EPA. A transformer had leaked while being prepared for shipment for destruction. A copy of the report was on file and was reviewed.

I inspected the emergency response and fire fighting equipment. All of this equipment was in good working order and had been recently inspected and maintained.

I inspected PCB handling equipment. Small items were stored in a designated drum with a lid. The drum was marked with a large PCB label. The drum was stored inside the welded steel pan with the PCB waste drums. Other items which were large enough were marked with their own large PCB marker.

SAFETY:

An inspector should make themselves aware of the emergency warning system in the facility before inspecting the yard area. Hard hat, safety shoes, and safety glasses should be worn.

ATTACHMENTS:

- A. Notebook
- B. Slides
- C. Manifests
- D. Site Diagram
- E. Waste Process Forms
- F. Notes generated by McManus and Boller
- G. Package of four waste receipts and manifests for drums observed and cross checked in the field.
- H. Package mailed in response to my 10 working day

request for further information.

- I. Outgoing materials check off sheets package
- J. List of drums cross checked for storage dates
- K. Georgetown leak detection equipment plan
- L. Packaging requirements fax

January 22, 1992
DATE

W. Douglas Smith
W. Douglas Smith, Sr. Compliance Investigator